



VERNON OPERATIONS
P.O. BOX 58447
VERNON, CA 90058

July 29, 2003

Robin Holloway, WST-3
RCRA Enforcement Office
U.S. EPA, Region 9
75 Hawthorne Street
San Francisco, CA 94105

Re: Warning Letter of June 30, 2003

Dear Ms. Holloway,

Pursuant to the warning letter of June 30, 2003, (Frances Schultz, Manager, RCRA Enforcement Office), I shall address, individually, each of the three (3) items listed.

- 1: *Submit a written Standard Operating Procedure that ensures that all containers that hold hazardous waste, both in satellite accumulation areas and 90-day storage areas, are labeled or marked clearly with the accumulation start date, the words "Hazardous Waste", the composition and physical state of the waste, the particular hazardous properties of the waste, and the name and address of the person producing the waste, as required by CCR 66262.34(f). Certify that all hazardous waste containers at your facility are properly labeled.*

As indicated during your visit, Pechiney Cast Plate is experiencing a general transition regarding the department of Environmental, Health and Safety, and specifically in the area of environmental monitoring and compliance functions. Due to the departure of personnel since the purchase of the facility from Century Aluminum, some changes in production, and your visit, all the environmental programs are being reviewed and updated to assure that Pechiney maintains full compliance.

For example, to address item No. 1 above, please find attached, an excerpt from the Pechiney Hazardous Waste Management Program. This section includes direction that assures that a label containing the required information will be affixed to all containers holding hazardous waste.

In addition, also please find attached photographs indicating that this procedure is being enforced.

- 2: *Certify that all containers of hazardous waste are kept closed, except when it is necessary to add or remove waste, as required by 66265.173(a).*

Again, please refer to the attached excerpt under "Waste Stored in Containers (drums), Container Management". This directive is now being monitored and enforced.

- 3: *Certify that the 55-gallon drum containing mineral spirits, paint, and water has been shipped offsite.*

I have attached a copy of the manifest used for the transportation of this drum for disposal.

Robin Holloway
Earl Clinkenbeard
July 29, 2003

Considering the results of the walk-through inspection of March 26, 2003, it appears that the majority of the violations involved drum labeling and exceeding storage time limits. Addressing the three items in the warning letter, cited above, will address nearly all the cited issues. However, it is Pechiney's intent to address each and every item identified during the inspection. Each item will be documented to include the corrective action taken. This report will be completed within 30 days of this letter and forwarded to you.

If you require additional information or data, please don't hesitate to contact me at 323.584.1900 ext 7144.

Thank you for your explanations and assistance during your site visit.

Sincerely,



Earl Clinkenbeard, PE
Engineering Specialist
Pechiney Cast Plate
PO Box 58447
Vernon, CA 90058
323.584.1900 ext 7144

Attachments:

- 1: excerpt from Pechiney Hazardous Waste Management Plan
- 2: photograph of label
- 3: copy of manifest for removal of mineral spirits, paint, and water

cc: A. J. Ursic, Consultant
Environmental Protection and Compliance, LLC
P.O. Box 1814
Upland, CA 91785-1814

Tom Reynolds, Plant Manager
Pechiney Cast Plate

TIME LIMITS FOR HAZARDOUS WASTE ACCUMULATION AND STORAGE

Due to concern regarding large quantities of hazardous wastes being stored improperly and sometimes abandoned, the hazardous waste laws are very strict concerning the quantity of waste that may be accumulated and the length of time before it must be transported off-site for proper treatment or disposal. In order to apply the generator holding time rules applicable to hazardous wastes, the definition of the terms "accumulation" and "storage" should be understood.

- Accumulation: is the time that hazardous waste is initially collected by the generator until the storage time limit is initiated.
- Storage: is the holding of containerized or isolated hazardous wastes either at the point of generation or at a specifically designed on-site storage area. Storage begins when accumulation stops.

90 DAY AND 180 DAY STORAGE LIMITATION

The on-site storage time limitations for California hazardous waste generators are 90 days for large quantity generators (LQGs) and 180 days for small quantity generators (SQGs). LQGs and SQGs must initiate the respective time limitation when the containerize waste first reaches the established hazardous waste storage area.

Building No. 124 located on the extreme south end of Building 112A has been established as the 90-day hazardous waste storage area for Pechiney Cast Plate. This location is identified in Figure 1.

SATELLITE ACCUMULATION RULE

Notwithstanding the 90-day and 180-day storage limitations described above, a generator may hold at the point of generation or an accumulation area, up to 55 gallons of hazardous waste or one quart of acute or extremely hazardous waste for up to one year, provided all the following requirements are met:

- The generator must not hold the accumulated waste on-site for more than one year from the initial date of accumulation, or more than the applicable 90-day or 180-day storage time limitation from the date the 55 gallon or one quart limitation is reached, whichever occurs first.
- The generator must accumulate the waste in containers other than tanks at a location at or near the location where the waste is generated, and this satellite accumulation point is under the control of the operator of the process generating the waste.
- The generator must label the containers used for accumulating the hazardous wastes with the words "Hazardous Waste." In addition, the following must be included on the label: the type of waste being accumulated, the date when accumulation began (date when first drop/gram of hazardous waste is placed into the container), the physical state of the waste, the hazardous properties of the waste, and the name and address of the generator. Figure 2 shows the satellite accumulation label required for this application.
- The generator must maintain the satellite accumulation containers in a closed and sealed condition at the accumulation points, except for the short time periods when generated wastes are being added to the containers.
- Within three days (72 hours) of reaching the 55-gallon / one-quart quantity limitation, the generator must:
 - Date the holding containers with the date on which the limit was reached. This date becomes the 90-day / 180-day accumulation start date.

- Move the holding containers to the established on-site hazardous waste storage area that complies with the storage area requirements.
- Arrange for transportation of the waste off-site within the 90-day / 180-day time limitation.

Pechiney Cast Plate has established three (3) satellite accumulation areas throughout the facility. Satellite Accumulation Area No. 1 is located in the truck shop in the northeast corner of Building 104 and is used to accumulate oil from forklift trucks and the plate castors. Satellite Accumulation Area No. 2 is located in the mold shop in the northwest corner of Building 104 and is used to accumulate refractory materials from casting molds and tooling. Satellite Accumulation Area No. 3 is located in the maintenance crib in the center of Building 112A and is used to accumulate oil and oily/greasy rags from the maintenance and finishing departments. These satellite accumulation areas are identified in Figure 1.

HAZARDOUS WASTE GENERATOR STORAGE REQUIREMENTS

The requirements for on-site management of hazardous waste are included under 22 CCR §66262.34, which governs accumulation of hazardous waste. This regulation specifies that generators are responsible for compliance with the following:

WASTE STORED IN CONTAINERS (DRUMS)

The following physical storage requirements for hazardous wastes in containers apply to Pechiney Cast Plate since all the hazardous wastes are stored in drums, with the exception of refractory, casting headers, RCF, and bag house filterables:

- Storage Containers: Containers must be compatible with the wastes stored. If the container is damaged or leaks, the waste must be transferred to a container that is in good condition. Containers must be inspected at least weekly to discover any leaks in the containers or the storage area containment system. Containers used for transportation must comply with the U.S. Department of Transportation requirements, including those in 49 CFR §173.28.
- Incompatible Wastes: Wastes that are incompatible with other wastes shall not be placed in the same container, or an unwashed container, which previously held an incompatible material. A container holding a hazardous waste that is incompatible with any other waste or material must be separated from the incompatible material by a dike, wall, berm, or other device.
- Ignitable or Reactive Wastes: Wastes that may ignite or are reactive according to the criteria described in Section III above must be located at least 15 meters (50 feet) from Pechiney Cast Plate's property line.
- Container Management: A container holding hazardous waste must be kept closed during transfer and storage, except when it is necessary to add or remove waste. Containers shall not be opened, handled, transferred, or stored in a manner that may cause a leak or container failure.

WASTES STORED IN TANKS

Pechiney Cast Plate does not store hazardous wastes in tanks. Therefore, a description of this requirement will not be provided here. See 22 CCR §66265.190-202 for further information and details, if and when necessary.

CLOSURE OF FACILITIES

Pechiney Cast Plate does not anticipate entering into closure activities in the foreseeable future. Therefore, a description of this requirement will not be provided here.

CONTAINER LABELING REQUIREMENTS

As a generator accumulating hazardous wastes on-site, Pechiney Cast Plate must comply with the following labeling requirements for all containers containing hazardous wastes. Such containers must be labeled with the following information:

- The accumulation start date and/or the date the 90-day storage period commenced;
- The words: "Hazardous Waste;"
- The composition and physical state of the waste;
- Hazardous properties of the waste, ie: flammable, toxic, corrosive or reactive;
- The name and address of the Pechiney Cast Plate.

To meet this container-labeling requirement for on-site accumulation of hazardous wastes, Pechiney Cast Plate utilizes the DOT hazardous waste shipping label shown in Figure 3. Only the blanks pertaining to the above-described required information need to be filled-in on this label during on-site accumulation and storage. The remaining blanks must be completed at the time of shipment of the wastes off-site.

INSPECTION REQUIREMENTS FOR HAZARDOUS WASTE STORAGE AREA

As a generator of hazardous waste in California, Pechiney Cast Plate must conduct periodic inspections of hazardous waste storage containers in all areas.

Weekly inspections are required for hazardous wastes stored in drums. The purpose of the weekly inspections is to allow Pechiney Cast Plate to discover leaking containers or their deterioration and to verify the continued effectiveness of the containment system and adequacy of safety equipment, communications equipment, and compliance with other waste storage requirements.

Pechiney Cast Plate must document these weekly inspections, the content of the inspections, and any deficiencies found. The inspection record must also indicate actions taken to address all deficiencies.

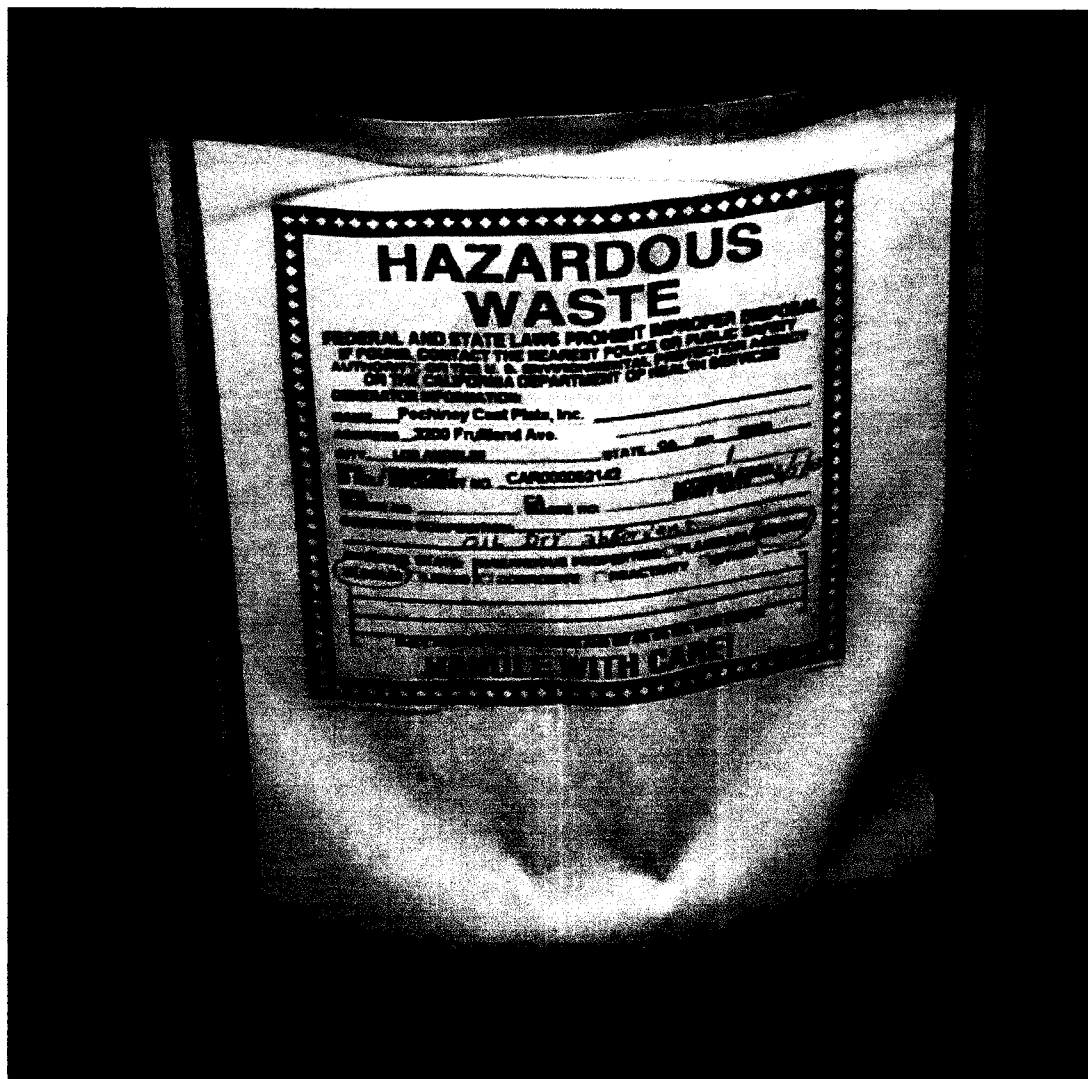
To facilitate Pechiney Cast Plate in making appropriate inspections and documenting this regulatory obligation, the following reporting forms are used:

Inspection Log

Deficiency Report

General Hazardous Waste Storage Area Inspection Checklist

Hazardous Waste Container Inspection Checklist



UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's US EPA ID No.

Manifest Document No.

2. Page 1

Information in the shaded areas
is not required by Federal law.

22465121

65121

of 1

A. State Manifest Document Number
22465121

B. State Generator's ID

C. State Transporter's ID [Reserved.]

D. Transporter's Phone (800)974-4495

E. State Transporter's ID [Reserved.]

F. Transporter's Phone

G. State Facility's ID

H. Facility's Phone (800)499-7145

3. Generator's Name and Mailing Address

PECHINEY CAST PLATE
3200 FRUITLAND
VERNON

CA 90058

4. Generator's Phone (323)584-1900

5. Transporter 1 Company Name

ASBURY ENVIRONMENTAL SERVICES

6. US EPA ID Number

CAD0038277036

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

PACIFIC RESOURCE RECOVERY
3150 EAST PICO BLVD.
LOS ANGELES

CA

90023

10. US EPA ID Number

CAD0008252403

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)

a. WASTE PAINT RELATED MATERIAL, 3, UN1263, PGII

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Val

1. Waste Number

State 343

EPA/Other
D001

State

EPA/Other

State

EPA/Other

State

EPA/Other

J. Additional Descriptions for Materials Listed Above

11A) 22110120, PQMA000014051 PROJ27583A13 MC PAINT AND THINNER

5X55

K. Handling Codes for Wastes Listed Above

a.

b.

c.

d.

15. Special Handling Instructions and Additional Information

USE PPE

NAERG # 11A. 128

SITE: 3200 FRUITLAND, LOS ANGELES, CA 90058

ADDITIONAL

EMERGENCY CONTACT: CHEMTREC 1-800-424-9300

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Month

Day

Year

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Month

Day

Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name

Signature

Month

Day

Year

DO NOT WRITE BELOW THIS LINE.

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. 9900791266B1051121		Manifest Document No. 21		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address PECHINEY CAST PLATE 3200 FRUITLAND VERNON CA 90058		4. Generator's Phone () 323-584-1900		5. State Manifest Document Number 22465121		6. State Generator's ID 9900791266B1051121		7. State Transporter's ID (Required) 05113102	
5. Transporter 1 Company Name ASEBURY ENVIRONMENTAL SERVICES		6. US EPA ID Number 05113102		8. State Transporter's ID (Required) 05113102		9. State Facility's ID 05113102		10. State Facility's ID 05113102	
7. Transporter 2 Company Name		8. US EPA ID Number		9. State Transporter's ID (Required)		10. State Facility's ID		11. State Facility's ID	
9. Designated Facility Name and Site Address PACIFIC RESOURCE RECOVERY 3150 EAST PICO BLVD LOS ANGELES CA 90023		10. US EPA ID Number 05113102		11. State Transporter's ID (Required) 05113102		12. State Facility's ID 05113102		13. State Facility's ID 05113102	
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste Number	
a. WASTE PAINT RELATED MATERIAL, 3, UN1203, PGH		05113102		6		6		6	
b.									
c.									
d.									
16. Additional Description for Materials Listed Above 11A 12B 12C 12D 12E 12F 12G 12H 12I 12J 12K 12L 12M 12N 12O 12P 12Q 12R 12S 12T 12U 12V 12W 12X 12Y 12Z		17. Additional Description for Materials Listed Above 11A 12B 12C 12D 12E 12F 12G 12H 12I 12J 12K 12L 12M 12N 12O 12P 12Q 12R 12S 12T 12U 12V 12W 12X 12Y 12Z		18. Additional Description for Materials Listed Above 11A 12B 12C 12D 12E 12F 12G 12H 12I 12J 12K 12L 12M 12N 12O 12P 12Q 12R 12S 12T 12U 12V 12W 12X 12Y 12Z		19. Additional Description for Materials Listed Above 11A 12B 12C 12D 12E 12F 12G 12H 12I 12J 12K 12L 12M 12N 12O 12P 12Q 12R 12S 12T 12U 12V 12W 12X 12Y 12Z		20. Additional Description for Materials Listed Above 11A 12B 12C 12D 12E 12F 12G 12H 12I 12J 12K 12L 12M 12N 12O 12P 12Q 12R 12S 12T 12U 12V 12W 12X 12Y 12Z	
15. Special Handling Instructions and Additional Information USE PPE NAERG #: 11A 12B SITE: 3200 FRUITLAND, LOS ANGELES, CA 90058 EMERGENCY CONTACT: CHEMTREC 1-800-424-9000									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway, according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name Earl Clinkendeare		Signature [Signature]		Month 05		Day 13		Year 02	
17. Transporter 1 Acknowledgment of Receipt of Materials Printed/Typed Name JURIA PRION		Signature [Signature]		Month 05		Day 13		Year 02	
18. Transporter 2 Acknowledgment of Receipt of Materials Printed/Typed Name		Signature		Month		Day		Year	
19. Discrepancy Indication Space									
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Fernando Ornelas									
Signature [Signature]		Month 05		Day 19		Year 02			

DO NOT WRITE BELOW THIS LINE.

ATTN: Earl Clinkendeare



Pacific
Resource
Recovery

Certificate of Recycling/Destruction

Pacific Resource Recovery certifies that the waste accepted from the generator described below will be managed in accordance with the United States EPA and State Regulations.

Pennsylvania Cast Plastics
Generator

CA1074120681
EPA ID #

22465121
Manifest Number

05-19-03
Date


Pacific Resource Recovery

PECHINEY CAST PLATE, INC. EMERGENCY EVACUATION & INFORMATION MAP

N

- Evacuation Routes
- (G) Main Gas Shut-off Valves
- (FA) Manual Fire Alarm Pulls
- (S) Emergency Spotter Locations
- (W) Main Water Shut-off (located underground on sidewalks)

